

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
CINCINNATI DIVISION**

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE, *et al.*,

Plaintiffs,

V.

FEDERAL ELECTION COMMISSION, *et al.*,

Defendants.

Civ. No. 22-639 (DRC)

NOTICE OF ANTICIPATED EXPERT TESTIMONY

**DEFENDANT FEDERAL ELECTION COMMISSION'S
NOTICE OF ANTICIPATED EXPERT TESTIMONY**

Pursuant to the Court’s August 1, 2023 Notation Order setting a discovery schedule and August 3, 2023 Notation Order modifying the schedule (the “August 3 Order”), defendant Federal Election Commission (“FEC” or “Commission”) hereby submits this Notice indicating its intention to retain expert witnesses and identifying topics which they will address. In compliance with the Court’s August 3 Order, the FEC will disclose the names of any retained expert witnesses concurrently with the submission of expert reports on or before September 15, 2023. *See* August 3 Order.

The FEC intends to retain one or more experts. The FEC currently anticipates that the expert testimony will generally address:

- (1) Americans' historical concerns with corruption and its appearance, including the role of political parties in elections and governance;
- (2) How political parties, candidates, and officeholders operate in elections and the political process, including coordinated party expenditures; and

- (3) The operation of limits on coordinated party expenditures to deter corruption and its appearance.

The Commission reserves the right to alter the subjects of expert testimony relevant to the matters raised in this case.

August 4, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2023, I served the foregoing pursuant to Fed. R. Civ. P. 5(b)(2)(E) on counsel of record, as a registered ECF user, through the Court's ECF system.

/s/ Harry J. Summers

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